Valleys. The unique serpentine floristic community along Coyote Ridge is also threatened with at-grade disruption by the three northern alignments options.

3.1.4 Suggested Mitigation Measures

The DEIR/S suggests that alignment plans and profiles could be adjusted and wildlife underpasses, bridges, and/or culverts could be considered among the proposed mitigation measures. The DEIR/S assures that these passes could provide movement for a wide range of species. In addition, according to the DEIR/S, similar mitigation measures have been shown to be successful.

The above argument pertaining to mitigation need to be scrutinized carefully. While the goal of providing wildlife crossings is laudable, poorly conceived or inadequate measures are a real possibility. The art and science of designing effective wildlife crossings can best be described as a work in progress. The concept itself is relatively new. CEQA guidelines (CEQA, Appendix G) state that projects must address whether activities interfere substantially with movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. However, the only species mentioned in the DEIR/S with regard to movement corridors is the federally endangered San Joaquin Kit Fox. In order to comply with CEQA, the report must also take into consideration other denizens of the San Joaquin Valley grassland community whose habitat will be adversely affected by any of the three alignment options crossing the valley floor. A partial list would include Tule Elk, Badger, Coyote, San Joaquin Coachwhip, Glossy Snake, Bobcat, and Black-Tailed Deer. In the San Antonio/Isabel Valleys, and Orestimba Creek region, the list would feature Tule Elk, Pronghorn, Mountain Lion, Coyote, Bobcat, Badger, Ringtail, Grey Fox, Black-Tailed Deer, and Coast Horned Lizard, among others. 0067-31

The main concern is to provide adequate crossings for all native species experiencing movement interruption. Focusing only on special status species (e.g. Kit Fox) will not suffice.

Also, the claim that wildlife crossings have been shown to be successful is debatable. Mention is made of an example from southern California benefiting coyotes and bobcats, but success in providing wildlife crossings in this area will only ensue by using a method or combination of methods benefiting a wide array of species, as CEQA requires.

3.2 Specific Environmental Impacts Associated with each of the Proposed Diablo/Pacheco Alignment Options

Based on the available data and knowledge of the region between Merced and the Bay Area, all of the proposed alternatives pass through important biological resources and unique habitats. Selection of any of these options is expected to result in significant 0067-32

environmental impacts. The following provides a description of these impacts that the DEIR/S either fails to mention or describes briefly with vague recommendations for appropriate mitigation measures. 0067-32 cont

3.2.1 Pacheco Pass Routes: (Gilroy/Bypass Morgan Hill and Gilroy)

1- Traverses crucial wetlands north of SR-152 in the San Joaquin Valley.
2- Traverses the Grasslands Wildlife Management Area east of Los Banos.
3- Exacerbates the threat of sprawl and poorly managed growth by proposing a station in Santa Nella, north of Los Banos and adjacent to several important wildlife areas; thus, putting unnecessary pressure on development near those lands. One of the advantages claimed by HSR proponents is the system's use of existing corridors and avoidance of sprawl. However, the Pacheco Route would only serve to hasten sprawl by locating a station in an out of the way locale.
4- An at-grade train west of I-5 would disrupt travel corridors and fragment habitat for a host of species, including the federally endangered San Joaquin kit fox, badger, and tule elk. In this alignment, the train would cut through the Romero Ranch — a highly coveted property purchased by The Nature Conservancy and resold with conservation easements. If constructed, the train would sever movement corridors for tule elk, and lower their viability by restricting their range. It would also decrease the likelihood of the ranch ever becoming purchased as an addition to nearby Henry W. Coe State Park or by the federal government for inclusion in the National Wildlife Refuge system.
5- At-grade sections of the alignment through Pacheco Pass would further defile this area, which is an important habitat for California red-legged frog and California tiger salamander, as well as other species like: mountain lion, ringtail, black-tailed deer, San Joaquin kit fox, badger, bobcat, coyote, and western pond turtle.
6- At-grade sections through the southeast portion of the Santa Clara Valley east of Gilroy would impact San Felipe Lake, identified by the Audubon Society as an Important Bird Area. The area is also habitat for San Joaquin kit fox and California tiger salamander.

3.2.2 Diablo Direct Routes: (Northern Tunnel, Tunnel Under Park, and Minimize Tunnel)

1- Crosses the west side of the San Joaquin Valley at grade; thus, disrupting some of the last remnants of this ecosystem.
2- Cuts through the Simon Newman Ranch — a crucial acquisition for The Nature Conservancy's Mount Hamilton Project. As with the Romero Ranch, this ranch provides habitat and dispersal corridors for a wide range of native species like the San Joaquin kit fox, badger, burrowing owl, spadefoot toad, San Joaquin coachwhip, and glossy snake. It has been mentioned as a key acquisition for the National Wildlife Refuge system.
3- Orestimba Creek: The Tunnel Under Park Alternative has the train running alongside portions of this watershed, which is key habitat for species such as the California red-legged frog, foothill yellow-legged frog, western pond turtle, spadefoot toad, tule elk, coast horned lizard, and ringtail.

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4- Henry W. Coe State Park: The Tunnel Under Park Alternative has the train traveling through the park and cutting through a wilderness area *(Please refer to Appendix 4)*— a pristine region home to a multitude of native species. Many of these species would be adversely affected by the proposed route.
5- San Antonio and Isabel Valleys: Sections of both of these intermountain valleys would be sliced by an at-grade train, if the northern route is selected. Both areas are highly coveted by The Nature Conservancy and could one day become additions to Henry W. Coe State Park if left in an undisturbed state. Both valleys contain excellent stands of oak savanna, and are essential habitat for native ungulates such as tule elk and pronghorn.
6- Coyote Ridge: This low-lying ridge southeast of San Jose lies in the path of the train. It is a very important ecological area due to its extensive serpentine soil areas, making it a haven for rare and endemic native plants. The CNPS and other environmental groups have been working for several years to preserve this area. (*Please refer to the CNPS Response Letter in Appendix 6*)
According to the CNPS the Coyote Ridge is characterized by the following:

- it is home to 10 special status animals and 14 special status plants;
- it is the only remaining viable habitat for the Bay checkerspot butterfly, which is listed as a federally threatened species;
- it also habitat for the California red-legged frog and California tiger salamander;
- it is home to the federally endangered jewelflower, which is only found in Metcalf Canyon in the middle of Coyote Ridge; and
- it is also home to three other plants listed as federally endangered species: Coyote ceanothus, Santa Clara Valley dudleya, Tiburon paintbrush.

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3.3 Sensitive Areas at Risk

The proposed Diablo/Pacheco routes pose numerous problems for native wildlife, habitats, and ecosystems. Here is a summary of some of these critical areas threatened by the proposed HSR system that the DEIR/S either fails to mention or describes briefly, with vague recommendations of appropriate mitigation measures:

3.3.1 Western flank of the San Joaquin Valley

Threatened by all three proposed alignments, this area located west of I-5, along the eastern front of the Diablo Range, is a remnant of the once vast central valley grassland ecosystem, which has lost over 95% of its original area due to irrigation, mechanized agriculture, and urban development. The San Joaquin Valley became a northern extension of the Mojave Desert biotic community, providing habitat for lower Sonoran life forms in an otherwise temperate region. Species such as the San Joaquin kit fox, blunt-nosed leopard lizard, giant kangaroo rat, greater roadrunner, spadefoot toad, San Joaquin antelope squirrel, San Joaquin coachwhip, and glossy snake found suitable habitat here with many of them reaching the northern limit of their habitat range.

Many of these species are federally listed under the Endangered Species Act. Habitat loss has been the overriding factor in their decline. Though isolated patches of habitat still exist on the valley floor, their disjunctive locations and small parcel sizes make habitat connectivity an unrealistic proposition. However, the lands west of I-5, from Altamont to Pacheco Pass, provide the most contiguous swath of habitat left in this region. The area as it exists now represents an excellent opportunity for ecological restoration. It is well documented that the federally endangered San Joaquin kit fox relies on this area. Tule elk, historic inhabitants of the Diablo Range and San Joaquin Valley, have also been reestablished here in the vicinity of San Luis Reservoir. Additionally, Pronghorn could be re-established here, as well as a host of smaller species listed under the federal Endangered Species Act, like the giant kangaroo rat, blunt-nosed leopard lizard, and the San Joaquin antelope squirrel. In addition, with the reintroduction of the California condor to the region, it is expected that this area will provide future foraging territory for this wide-ranging species. Reintroduction of native ungulates such as tule elk and Pronghorn are called for in the California Condor Recovery Plan in likely foraging areas (USFWS 1996).

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For any large-scale ecological restoration to occur, large parcels of land with minimal barriers are needed. This is the reason why the Romero and Simon Newman Ranches were identified as priorities and purchased by The Nature Conservancy. It is therefore predictable that a train running at-grade through this area would be deplorable: it would fragment habitat for creatures already using the area, and preclude any possibility for further ecological restoration.

3.3.2 Los Banos Wildlife Area

The last remaining sizable tract of fresh water wetland habitat left in the San Joaquin Valley lies north and east of Los Banos. A combination of National Wildlife Refuges and state wildlife areas, in public and private ownership, work together to protect this valuable natural resource. In the path of the Pacific Flyway, this area is a crucial wintering ground for a host of migratory waterfowl species. It is also essential habitat for the giant garter snake — an aquatic species endemic to the central valley and listed as threatened under the Endangered Species Act. The area is also pivotal for other sensitive species such as the San Joaquin kit fox, spadefoot toad, and California tiger salamander. The proposed at-grade segments of the HSR would threaten this area if the Pacheco Route were adopted.

3.3.3 Grassland Water District (GWD) and Grassland Ecological Area (GEA)

As the Pacheco Alignment passes north of Los Banos, it bisects the Grasslands Ecological Area (GEA). Encompassing approximately 180,000 acres, the GEA is the largest wetland complex in California and contains the largest block of contiguous wetlands remaining in the Central Valley. (Grasslands Water District, Land Use and Economics Study: Grasslands Ecological Area (July 2001), p. 2 (hereafter "*Grassland*

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Water District").[8] The GEA boundary is a non-jurisdictional boundary designated by the U.S. Fish & Wildlife Service in order to identify an area for priority purchase of public easements for wetland preservation and enhancement. (Id.) The GEA includes federal wildlife refuges, a state park, state wildlife management areas and the largest block of privately managed wetlands in the state. The GEA also includes a large and growing portfolio of federal, state and private conservation easements. Through 1998, conservation easements had been acquired on over 64,000 acres at a total cost of over $28 million. (Id. at pp. 11-12.)

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The GEA is of considerable importance because it preserves a variety of habitats important to the maintenance of biodiversity on a local, regional, national and international scale. It has been estimated that 30 percent of the Central Valley migratory population of waterfowl use this area for winter foraging. (U.S. Bureau of Reclamation, Final NEPA EA, Refuge Water Supply Long-Term Water Supply Agreements (January 2002).) The GEA is a major wintering ground for migratory waterfowl and shorebirds of the Pacific Flyway and the Western Hemisphere Shorebird Reserve Network has designated the GEA as one of only 22 international shorebird reserves in the world. (Fredrickson, Leigh H. and Laubhan, Murray K, Land Use Impacts and Habitat Preservation in the Grasslands of Western Merced County, CA (February 1995), p.3.) Over a million waterfowl are regularly found in the GEA during the winter months. (Grasslands Water District, supra, at p. 2.) The GEA also provides habitat for more than 550 species of plants and animals, including 47 plant and animal species that are endangered, threatened or candidate species under state or federal law. (Id.)

In addition to providing critical biological habitat, the Grassland wetlands provide substantial direct economic contributions to the local and regional economies. The GEA receives over 300,000 user visits per year for hunting, fishing and non-consumptive wildlife recreation. (Id. at p. 14). Recreational and other activities related to habitat values within the GEA contributes $41 million per year to the Merced County economy, and accounts for approximately 800 jobs. (Id. at p. 21.)

Without a careful study of the impacts that the Pacheco route may have on this area, this project risks destroying an irreplaceable ecological resource of international importance. It also risks destroying the substantial direct economic contributions to the local and regional economies that the Grassland wetlands provide, as well as wasting the tens of millions of federal, state and local dollars that have been spent protecting this area.

3.3.4 Pacheco Creek

Although already damaged by the routing of SR-152, this area still comprises suitable habitat for several endangered, threatened, and species of special concern. Adding another barrier to animal movement and migration such as the proposed at-grade HSR would further degrade the area. The proposed HSR passes through a Pacheco creek watershed providing critical habitat for California red-legged frogs, western pond turtles

[8] This report is available on the Internet at http://www.traenviro.com/cgwd/geastudy.htm.

and California tiger salamanders. It also contains large tracts of sycamore riparian areas. Additionally, the San Joaquin kit fox has been seen in the vicinity.
Sycamore Riparian is typified by open grassland and sycamores where the streams are low-gradient, but have not incised into the alluvium and are, instead, spread out and meandering. There is an absolutely wonderful and stunning patch of sycamore riparian along Hwy 152, from Casa de Fruta up to about Pacheco Lake[9].

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3.3.5 San Felipe Lake

Identified by the Audubon Society as an "Important Bird Area", particularly for waterfowl. The general area also provides upland and breeding habitat for the California tiger salamander. This area is threatened by the Pacheco alignment. The willow thicket riparian habitat is probably the most endangered of all of the riparian habitats. Originally, it occurred extensively in the sausals[10]. At present, there are wonderful thickets near San Felipe Lake[9].

3.3.6 Orestimba Creek

An important riparian corridor supporting several species of native fish, California red-legged frog, foothill yellow-legged frog, western pond turtle, and spadefoot toad. It may be the only year-round stream in the region without a road or other transportation corridor running alongside it, and deserves to be preserved in its near pristine state. **Construction and establishment of an HSR corridor would jeopardize the integrity of the creek by increasing siltation and sedimentation for its aquatic inhabitants, and creating movement barriers for the many terrestrial creatures using the watershed**.

3.3.7 Henry W. Coe State Park

Northern California's largest state park, home to a wide variety of native plants and animals, home to California red-legged frog, coast horned lizard, tule elk, western pond turtles, mountain lion, ringtail, and many other species whose existence in the region is strengthened by the presence of this large park. The park is a sanctuary for native species and has always been managed with biodiversity in mind. The Orestimba Wilderness *(Please Refer to the Response Letter of Henry W. Coe Park Advocates* http://www.coeadvocates.org/AdvocatesForCoe-DEIR-Response%20ForReaderV4.pdf) was created 20 years ago to preserve and protect the areas natural resources. At 23,000 acres, it represents a substantial portion (over 25%) of the park's land, as well as a long term commitment to protect biodiversity.
The Diablo-Range riparian habitat? exists either along high-gradient streams or at higher altitude with low-gradient streams where there are limited alluvial soils. The effect of water in this dry range is immense, and this riparian habitat ranges from willow thickets

[9] Bill Bousman: Santa Clara Valley Audubon Society volunteer and lead author for the Santa Clara County Breeding Bird Atlas.
[10] The Spanish referred to the fresh water willow thickets as sausals

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to valley oak savanna to sycamores over shaded, rock-strewn steams. Much of this is protected with Henry Coe State Park. However, in the vicinity of the park much of it is still vulnerable to grazing. Also near the park, there are cliffs and waterfalls of stunning beauty. Most are difficult of access and many are on private lands. These are the jewels of the Diablo Range[9].
Also in Henry W. Coe Park, the forest/woodland habitat is a very conventional category. With the continuing damage to California's oaks, Henry Coe has grown so large and can protect so many different oak forests with controls on grazing. It also provides a unique natural laboratory for study as well as a reservoir for the future of oaks.
Incredibly, one of the HSR routes slices through this area. No part of Henry W. Coe State Park should be violated by a train, at grade or contained in a tunnel.

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3.3.8 San Antonio and Isabel Valleys

Intermountain valleys are rare in the Diablo Range, especially in the northern segment. These two adjacent valleys are nearly pristine wildlife areas, consisting of large tracts of grassland and both blue and valley oak savannah. These vegetation communities, endemic to California and important ecological communities, have become increasingly scarce due to agricultural and suburban development. This region provides vital breeding and foraging ground for tule elk — an endemic California subspecies of elk that was extirpated from the region in the 19th century and reintroduced to the region in 1978 by the California Department of Fish and Game. Another species reintroduced to the area at the same time was the pronghorn. The small herd recent estimates place their size at about two-dozen individuals inhabiting Isabel Valley. This number represents the larger of only two populations in the Diablo Range. While both species would be greatly affected by the proposed at-grade segments of the Northern Tunnel HSR alignment, pronghorn would be particularly devastated. They require unfenced tracts of open land to forage and expand their range. They are less likely to use canyons and mountains as migration corridors, especially if the terrain is heavily wooded or brushy. An HSR corridor would almost certainly doom this species.
The oak Savanna is mostly found in San Antonio Valley. This was once very common along the edge of the Santa Clara Valley and now is almost totally gone. There are still excellent examples in the Diablo Range on alluvial soils[9].

Both valleys are highly valued by The Nature Conservancy, to the extent that they may be the most desirable areas in the entire Mount Hamilton Project. Both lie in close proximity to Henry W. Coe State Park. It is, therefore, reasonable to assume that in the near future portions of both valleys could become welcome additions to the state park system. For all of the above reasons, an HSR alignment through this magnificent region should be avoided at all costs.

3.3.9 Coyote Ridge

Southeast of San Jose, this area is a hotbed of regional biodiversity. Its extensive serpentine soil areas provide habitat for a number of rare and endemic plant species. It is

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also the last sizable stronghold for the federally threatened bay checkerspot butterfly, and is also home to tule elk, badgers, and other grassland species. This area is threatened by the northern HSR alignments (*Please refer to the CNPS Response Letter in Appendix 6*)

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3.4 Impact Analysis of the Proposed Diablo/Pacheco Routes on the Ecosystem

As mentioned earlier, the impact analysis on biological resources in the DEIR/S focuses solely on the number of species that are threatened, endangered, or under the special status listing. However, the presence of sensitive habitats, wilderness area, and significant portion of undisturbed land along the Diablo/Pacheco routes requires an analysis of the impacts on the biodiversity and on the degradation of these habitats.
The following points are all based on careful studies by well-established ecologists and population biologists. These speak to the importance of assessing impacts at the ecosystem level and point to potential cumulative impacts.

1. **Barriers to migration fragment natural areas.**
   For Coe, the HSR would severely impact small mammals, amphibians, and reptiles. For example, breeding California newts migrate far from their breeding grounds in streams and ponds at the end of the wet season. They may actually go as much as a mile or more away. At the start of the next season, they return to within a few meters of their original breeding grounds. The HSR would clearly disrupt this pattern

2. **The smaller a natural area the fewer species it can sustain.**
   Island studies indicate that there is a clear relationship between number of species and area. While there is dispute over the exact formula, no biologist questions this basic finding. It can also be applied to fragmented forests.

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3. **As species decline in a natural area, overall biological productivity per unit area declines.**
   A dramatic example is a large carnivore such as a mountain lion. These animals rely on a large area with a radius of as much as five miles to survive. The unfortunate incident between a mountain lion and the bicyclist in Southern California not long ago could well reflect the limited size of the natural area in which the lion was forced to live and the consequent shortage of prey. Loss of species leads to loss of productivity.

4. **A large number of species provides a far better buffer than a small number to withstand and stresses such as fire, drought, human intrusions, etc.**
   Coe is a particularly impressive example in that it is a very large wild area with a rich endowment of species from many different groups of organisms and is part of a much larger complex of the Diablo Range.

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5. **The larger an area the larger and more varied the gene pool a given species can sustain.**
   For example, the relatively steep moisture gradient across Coe means that a species may have some members more adapted to moister conditions and some more adapted to drier conditions, buffering the species against both short- and long-term climate change through its ability to exchange genes between different individuals.

6. **The larger the number of species in a given area the greater its long-term stability.**
   The number of species in a given area is determined by the rate of recruitment versus the rate of extinction. It is commonly known that the smaller an area the greater the chance that a species will disappear from that area. Also, the smaller an area is the lower the number of species it will recruit.

Considering the above-listed guidelines, an ecosystem-based perspective would conclude that creating new transportation corridors and degrading pristine areas would only serve to fragment habitats, isolating and thus weakening the long term viability of many creatures – not just those accorded special status. Therefore, in order for the HSR to be a better option than the Modal Alternative, the proposed alignment should follow existing transportation corridors and avoid impacting sensitive habitats and disturbing pristine wilderness areas.

A revised D EIR/S study is suggested to include reasonable alternative route options with a biological-resources analysis that includes quantification for the fragmentation of ecosystems, the degradation of watersheds, and the decrease of biodiversity. Additionally, proposed mitigation measures for the loss and fragmentation of habitats and the decrease in biodiversity should be provided.

3.5 Analysis of Impact on the 4(f) and 6(f) Resources

Impact on the 4(f) and 6(f) resources has been analyzed on a very broad level in the DEIR/S. Additionally, several flaws in the analysis of the 4(f) and 6(f) have been identified:

3.5.1 Incomplete Listing of 4(f) and 6(f) Resources

The DEIR/S lists the most significant "4(f) and 6(f) resources" by region. For the Bay-Area-to-Merced region, the DEIR/S list of these resources includes the following:

- Don Edwards San Francisco Bay National Wildlife Refuge,
- Henry W. Coe State Park, and
- many local parks.

This list is patently incomplete. For example, the DEIR/S fails even to mention that the proposed Pacheco Route would pass through a national wildlife refuge complex, near Los

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Banos. Additionally, the same proposed route would pass through the northern edge of the Pacheco State Park and the Upper Cottonwood Creek Wildlife Management Area.

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3.5.2 Ill-Founded comparison between the 4(f) and 6(f) resources

For the Bay-Area-to-Merced segment the DEIR/S states the following: "*The HSR Alternative could impact between three and eight Section 4(f) and 6(f) resources, depending on the alignment option.*" (DEIR/S, Page 3.16-7)

The above quote seems to suggest that the HSR alternative is relatively benign, since only a small proportion of parks (3 to 8 parks out of approximately 35 parks) would be affected. However, not all parks are equal in value. A train through Henry W. Coe State Park or a national wildlife refuge would have significantly more impact than a train going through a city park (*Please refer to the Biological Resources Chapter 2 in this response letter for a detailed description of the impacts on ecosystems, sensitive habitats and endangered species*). Numbers become meaningless when discussing fragmentation of wild lands. Instead of counting the number of parks, comparison should be made using the acreage and type of public lands that could be bisected by each of the alternative options.

3.5.3 Flaws in Addressing the Henry W. Coe State Park Issue

The DEIR/S confirms that the Minimize-Tunnel option would impact the Henry W. Coe State Park, and it may be difficult to mitigate for this impact. However, the DEIR/S confirms that the two other alternative routes that pass through the Diablo Range are considered as potential avoidance options.
It is essential to note that a tunnel under the park may still have significant effect on the park, and such effect must be analyzed vigorously in the DEIR/S. For example, such a tunnel would degrade the wild character of the region immediately outside of the park boundaries where it would be at-grade or cut-and-fill. In addition, tunnel ventilation , security/safety access points and other similar considerations would create permanent non-natural features. Henry W. Coe State Park is expected to increase in size, and properties with cut-and-fill section would forever be precluded from being added to the park. For the same reason, the option north of the park is an unreasonable choice knowing that it contains some pristine, high quality wildlife habitat that would be forever altered by the installation of a HSR route.

3.6 Aesthetic and Visual Resources

The DEIR/S fails to adequately analyze the aesthetic and visual impacts caused by the passage of the HSR through the Diablo Mountain Range. We consider these impacts highly significant and they require careful analysis.

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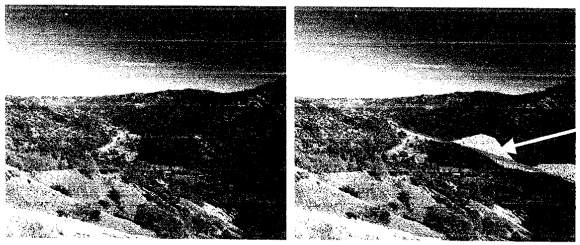

The above picture, to the left, shows a northwest view of the Robinson Creek Meadow. The picture to the right shows a three-dimensional simulation of the passage of the minimize tunnel option. The DEIR/S considers the simulated segment shown above as an at-grade segment. However, the construction of this at-grade segment would entail significant cut-and-fill and cause major visual impact.

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3.6.1 Contradictory Statements in the Analysis of the Visual Impacts

In one statement, the DEIR/S considers that the natural open spaces and the parks would have the highest visual impact and would be subject to high contrast visual changes. However, in a following paragraph, the DEIR/S concludes that all the potential high visual impacts can be reduced or mitigated through design adjustments. This concluding statement is completely unjustified and confusing in light of the earlier statement detailing the broad impact of the system on open spaces and parks.

3.6.2 Failure to Focus on Acoustic Aesthetics

The effect of noise generated by the HSR system is not addressed in the report. Sound is certainly an aesthetic quality, but is mentioned only with respect to urban and suburban areas. However, the impact of noise in open space areas merits consideration. In particular, public open space areas like Henry W. Coe State Park are highly valued not just for their scenic attributes but also for the serenity and silence, and for the natural sounds emanating from the landscape. Frequent passing of HSR will surely detract considerably from the acoustic qualities of an area, not just for people wanting to "get away from it all" but for creatures which would suffer disturbance or displacement due to the excessive noise.

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3.6.3 Mitigation Measures for the Potential Visual Impacts

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As mentioned earlier, the DEIR/S confirms the significant visual impacts that the project would entail on the open spaces and parks. However, the DEIR/S contains no analysis of mitigation strategies for these areas of high impact. The mitigation measures provided are vague and very broad.

Prior to the selection of a preferred corridor, it is essential to analyze the impacts and appropriate mitigation strategies for the entrances and exits of tunnels and the extensive cut-and-fill work for the passages at grade along the Diablo/Pacheco routes.